

## EXHIBIT 2

**From:** Kayo Sady [ksady@dciconsult.com]  
**Sent:** Tuesday, February 21, 2017 6:43 AM  
**To:** Jim Wildman; Cliff Haimann; Rob Teitsma  
**Cc:** Eric Dunleavy  
**Subject:** RE: Coding of Injury Data

That makes sense Jim. In coding ourselves, it seemed that some injuries might go either way. Perhaps we can detail

Also, have you been able to speak to the two clients about getting information about who was hired (not just injured) during the time periods of interest (i.e. the time periods covered by the injury data)?

I am on the road all this week but could squeeze in a call either early in the day or late in the day if a discussion would be helpful.

Thanks,  
Kayo

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**From:** Jim Wildman [mailto:jwildman@costreductiontech.com]  
**Sent:** Monday, February 20, 2017 10:33 AM  
**To:** Cliff Haimann <[chaimann@dciconsult.com](mailto:chaimann@dciconsult.com)>; Rob Teitsma <[rteitsma@costreductiontech.com](mailto:rteitsma@costreductiontech.com)>  
**Cc:** Kayo Sady <[ksady@dciconsult.com](mailto:ksady@dciconsult.com)>  
**Subject:** RE: Coding of Injury Data

We will need to discuss as there certainly is a difference in what we tell our clients and what you have identified. Typically, any accident (described as an event that happens by chance or that is without apparent or deliberate cause) we do not claim to be able to prevent with our testing. Any injuries resulting from an accident we believe should not be included. We tell clients we match the physical capabilities of an applicant to the physical job demands (defined as tasks requiring pushing, pulling, lifting and carrying) and by doing so we reduce the likelihood of a soft-tissue strains or sprains in the tested joints. We only test the knees, shoulders and trunk and therefore any strains or sprains to the neck, wrist, ankle, etc we do not think should be included. We do not identify strength deficits to non-scheduled joints from our pre-employment testing. Non-scheduled joints are not included in the Department of Labor's strength ratings so we don't include those in our test. Maybe we can discuss sometime today as I am in until 3:30 Central.

Cost Reduction Technologies  
1880 Radford Road  
Dubuque, IA 52002  
Redacted

[www.costreductiontech.com](http://www.costreductiontech.com)

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**From:** Cliff Haimann [mailto:[chaimann@dciconsult.com](mailto:chaimann@dciconsult.com)]  
**Sent:** Monday, February 20, 2017 8:56 AM  
**To:** Jim Wildman; Rob Teitsma  
**Cc:** Kayo Sady  
**Subject:** Coding of Injury Data

Good Morning:

**EXHIBIT**

Exhibit 11 Crosby 10/07/2020

exhibitsticker.com

We agreed with your analysis of injuries in the vast majority of cases; however, there were some instances where we coding the data differently. I have attached an excel file that provides those instances. It has 3 tabs, and each contains the injury description and the original color codes. Next to that information is a column with our color code for each injury. For our coding, [REDACTED] means include the injury, while yellow means exclude the injury. Finally, there is a column that provides the rationale for our decision.

We can discuss these injuries more thoroughly, but I wanted to pass them along. Let us know if you have any questions.

Best,

Clifford Haimann, PhD  
Consultant  
DCI Consulting Group, Inc.  
[Chairmann@dciconsult.com](mailto:Chairmann@dciconsult.com)

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